



ORIGINAL

May 29, 2012

BY HAND

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

FILED/ACCEPTED

JUN - 5 2012

Federal Communications Commission
Office of the Secretary

Re: Primus Telecommunications Quarterly PIU Report for 1st Quarter 2012,
WC Docket No. 05-68

Dear Secretary Dortch:

On behalf of Primus Telecommunications, Inc. ("Primus"), please find attached a redacted, public version and a confidential version of the Officer Certification required in WC Docket No. 05-68 for 1st Quarter 2012.

Primus, pursuant to Sections 0.457 and 0.459 of the Commission's Rules, 47 C.F.R. §§5 0.457, 0.459 (1994), hereby requests that the attached confidential Certification be treated as a confidential document not subject to public inspection. This Certification contains information regarding Primus' calling card traffic patterns and revenue --- information that would not otherwise be available to the public. Due to the confidential nature of such information, Primus hereby requests that the attached confidential Certification be treated as a confidential document not subject to public inspection. Accordingly, the attached Certification of Primus has been marked "CONFIDENTIAL - NOT FOR PUBLIC INSPECTION." Primus provides justification for the confidential treatment of this information in Attachment 1 to this letter. Primus is also submitting, under separate cover, for inclusion in the Commission's public files, a redacted version of this Certification. The redacted version is marked "REDACTED - FOR PUBLIC INSPECTION," with the confidential information redacted.

For both versions of this filing, Primus is providing an original and four copies and, for both versions, an extra copy of each to be stamped and returned to the courier.

Should you have any questions concerning this filing, or the request for confidentiality, please do not hesitate to contact me at (610) 637-4553.

Respectfully submitted,

John D. Filipowicz
John D. Filipowicz,
General Counsel

cc: Chief, Pricing Policy Division, Wireline Competition Bureau, FCC
Best Copy and Printing, Inc (fcc@bpciweb.com)

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ATTACHMENT 1
Confidentiality Justification

Primus requests confidential treatment of the information being provided in its Pre-Paid Calling Card Provider FCC Quarterly Certification ("Certification") because this information is competitively sensitive and its disclosure would have a negative competitive impact on Primus were it made publicly available. Such information would not ordinarily be made available to the public, and should be afforded confidential treatment under 47 C.F.R. §§90.457 and 0.459.

47 C.F.R. 0§.457

Specific information in the Certification is confidential and proprietary to Primus as "trade secrets and commercial or financial information" under Section 47 C.F.R. §0.457(d). Disclosure of such information to the public would risk revealing company-sensitive proprietary information in connection with Primus' ongoing business and operations.

47 C.F.R. 0. §459

Specific information in the Certification is also subject to protection under 47 C.F.R. §0.459, as demonstrated below.

Information for which confidential treatment is sought

Primus requests that specific information in the Certification, marked as "[REDACTED]" be treated on a confidential basis under Exemption 4 of the Freedom of Information Act. The information designated as confidential is information regarding Primus' percentage of intrastate, interstate and international calling card minutes. This information is competitively sensitive information that Primus maintains as confidential and is not normally made available to the public. Release of the information would have a substantial negative impact on Primus since it would provide competitors with commercially sensitive information. The non-redacted version of Primus' filing is marked as "CONFIDENTIAL - NOT FOR PUBLIC INSPECTION."

Commission proceeding in which the information was submitted

The information is being submitted as Primus' Pre-Paid Calling Provider FCC Quarterly Certification in WC Docket No. 05-68.

Degree to which the information in question is commercial or financial, or contains a trade secret or is privileged

The information designated as confidential is information regarding Primus' percentage of intrastate, interstate and international calling card minutes. As noted above, the data is competitively sensitive information which is not normally released to the public as such release would have a substantial negative competitive impact on Primus.

Degree to which the information concerns a service that is subject to competition and manner in which disclosure of the information could result in substantial harm

The release of this confidential and proprietary information would cause Primus competitive harm by allowing its competitors to become aware of sensitive proprietary information regarding the operation of Primus' business.

Measures taken by Primus to prevent unauthorized disclosure: and availability of the information to the public and extent of any previous disclosures of the information to third parties

Primus has treated and continues to treat the non-public information disclosed in this Certification as confidential and has protected it from public disclosure to parties outside of the company.

Justification of the period during which Primus asserts that the material should not be available for public disclosure

Primus cannot determine at this time any date on which this information should not be considered confidential.

Other information Primus believes may be useful in assessing whether its request for confidentiality should be granted

Under applicable Commission decisions, the information in question should be withheld from public disclosure.

CERTIFICATION OF PRIMUS TELECOMMUNICATIONS, INC.

1. Pursuant to 47 C.F.R. § 64.5001(c), the undersigned hereby certifies that they are an officer of Primus Telecommunications, Inc. ("Primus"); and that to the best of my knowledge, information or belief, all statements of fact contained in this certification are true and that said certification is an accurate statement of the data set forth herein for the reporting period of fourth quarter 2011.
2. The following is the percentage of intrastate, interstate, and international calling card minutes for the above stated reporting period.
 - a. Percentage of intrastate calling card minutes: [REDACTED]
 - b. Percentage of interstate calling card minutes: [REDACTED]
 - c. Percentage of international calling card minutes: [REDACTED]
3. The percentage of total prepaid calling card service revenue (excluding revenue from prepaid calling cards sold by, to, or pursuant to contract with the Department of Defense (DoD) or a DoD entity) attributable to interstate and international calls for the reporting period is [REDACTED] percent.
4. Primus is contributing to the required Universal Service Fund based on the reported information, to the extent required by the applicable Commission regulations.
5. Primus has provided the reports required under paragraph (a) of 47 C.F.R. § 64.5001 to carriers from which transport services are purchased.

The foregoing certification is made under penalty of perjury of the laws of the Commonwealth of Virginia on this, the 14th day of May, 2012.

SIGNATURE: John D. Filipowicz
PRINTED NAME: John D. Filipowicz
POSITION: General Counsel



April 18, 2012

Mr. Jess DiPasquale
Alliance Group Services Inc.
1221 Post Road East
Westport, CT 06880

Re: First Quarter 2012 PIU Report

Dear Mr. DiPasquale:

Pursuant to the Federal Communications Commission Order (WC Docket No. 05-68), Primus Telecommunications, Inc. ("Primus") hereby submits the enclosed percentage of interstate usage information, on a state-by-state basis, with respect to its prepaid calling business.

If you have any questions, or if I can provide you with any further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrice Fearon". The signature is fluid and cursive, with the first name "Patrice" and last name "Fearon" clearly distinguishable.

Patrice Fearon
Contract Compliance

Cc: Manager – Contracts, AGSI

Orig State	Intl	Intl-488	Inter-488	Intra-488	Total	Intl %	Inter %	Intra %
AL	433,608	954	10,164	3,198	447,924	0%		0%
AR	258,096	3,216	8,088	306	269,706	97%	3%	0%
AZ	810,882	58,644	5,760	948	876,234	99%	1%	0%
CA	16,433,238	3,046,986	1,100,616	1,808,700	22,389,540	87%	5%	8%
CO	952,008	102,708	35,496	5,916	1,096,128	96%	3%	1%
CT	684,624	29,184	22,710	10,314	746,832	96%	3%	1%
DA	103,908	-	-	-	103,908	100%	0%	0%
DC	345,126	21,006	13,278	-	379,410	97%	3%	0%
DE	462,738	-	18,876	138	481,752	96%	4%	0%
ER	58,464	-	-	-	58,464	100%	0%	0%
FL	5,729,784	809,520	340,962	199,722	7,079,988	92%	5%	3%
GA	2,380,140	32,580	21,696	5,472	2,439,888	0%	0%	0%
IA	234,264	69,282	25,554	3,618	332,718	91%	8%	1%
ID	50,904	21,498	19,560	54	92,016	79%	21%	0%
IL	2,255,604	590,358	323,592	236,322	3,405,876	84%	10%	7%
IN	454,266	42,624	61,236	13,554	571,680	87%	11%	2%
IS	1,362	-	-	-	1,362	100%	0%	0%
KS	312,066	23,496	62,970	48,852	447,384	75%	14%	11%
KY	417,660	7,344	3,084	-	428,088	99%	1%	0%
LA	711,306	3,594	-	6	714,906	100%	0%	0%
MA	2,026,110	93,894	10,872	2,838	2,133,714	99%	1%	0%
MD	3,595,200	113,958	37,434	10,962	3,757,554	99%	1%	0%
ME	45,492	-	-	-	45,492	100%	0%	0%
MI	3,299,688	187,752	60,744	189,666	3,737,850	93%	2%	5%
MN	968,562	28,080	71,868	936	1,069,446	93%	7%	0%
MO	1,230,804	72	52,248	2,958	1,286,082	96%	4%	0%
MS	175,434	-	-	-	175,434	100%	0%	0%
MT	46,824	-	-	-	46,824	100%	0%	0%
NC	1,732,476	412,572	158,160	20,514	2,323,722	92%	7%	1%
ND	102	-	-	-	102	100%	0%	0%
NE	338,664	-	-	-	338,664	100%	0%	0%
NH	187,308	24,288	9,996	762	222,354	95%	4%	0%
NJ	3,138,018	428,148	194,454	126,600	3,887,220	92%	5%	3%
NM	17,460	51,672	83,430	9,168	161,730	43%	52%	6%
NV	709,164	3,528	5,082	-	717,774	99%	1%	0%
NY	4,878,312	369,654	409,938	127,998	5,785,902	91%	7%	2%
OH	2,912,682	374,124	199,206	47,682	3,533,694	93%	6%	1%
OK	279,210	55,038	22,368	2,070	358,686	93%	6%	1%
OR	595,710	12,150	108,024	4,308	720,192	84%	15%	1%
PA	1,910,184	232,710	103,062	45,246	2,291,202	94%	4%	2%
RI	252,306	-	-	-	252,306	100%	0%	0%
SC	485,496	48,240	16,884	1,812	552,432	97%	3%	0%
SD	58,962	-	1,350	-	60,312	98%	2%	0%
TN	640,902	158,928	84,432	24,108	908,370	88%	9%	3%
TX	5,214,798	355,338	231,708	34,134	5,835,978	95%	4%	1%
UT	542,538	53,346	6,978	1,290	604,152	99%	1%	0%
VA	3,291,810	192,786	181,374	36,600	3,702,570	0%	0%	0%
VT	3,870	1,038	14,082	288	19,278	25%	73%	1%
WA	1,211,868	152,358	94,344	31,764	1,490,334	92%	6%	2%
WI	814,488	53,736	58,122	8,376	934,722	93%	6%	1%
WV	369,114	15,810	9,150	-	394,074	98%	2%	0%
WY	678	-	-	-	678	100%	0%	0%
Total	74,864,282	8,282,214	4,298,952	3,867,200	89,712,648	92%	5%	3%